

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:

David Lee Jones,

Debtor,

Ronda J. Winnecour, Chapter 13 Trustee,

Movant,

v.

David Lee Jones,

Respondent.

Case No. 17-23561-GLT

Chapter 13

Docket Document No. 216
Related to DD No. 210, 211

**RESPONSE TO TRSUTEE's NOTICE OF FINAL CURE AND STATUS REPORT
CONCERNING CASE**

AND NOW David Lee Jones, through attorney David A. Colecchia, Esq., files the within Response to the Trustee's Notice of final Cure, as well as a Status Report concerning the case. In support of the same, the debtor avers the following:

1. This response related to the Trustee's Notice of final Cure, and the Court's Order setting a Status Conference as to why the financial management course and Certification of Financial Eligibility have not been filed.
2. Unfortunately, last fall the Debtor David Lee Jones passed away.
3. The Debtor's only son and heir, Matthew James Jones, opened an estate and was appointed as executor of the Debtor's estate.
4. That same heir made the final payments necessary to complete the Debtor's Plan, and is making long-term continuing payments on the Debtor's debts as required by the chapter 13 Trustee.
5. As a result, this office is authorized to file the within response.

6. Due to the Debtor's death, it is impossible for the Debtor to complete a financial management course, nor is it possible for the undersigned Counsel to question the Debtor specifically as required by the Certification of Discharge Eligibility.

7. However, the Debtor will be filing a separate Motion seeking exemption from the requirements to complete a Financial Management Course by operation of 11 USC §109(h)(4), as well as seeking the authority to use a modified Certificate of Discharge Eligibility where the undersigned Counsel questions the Debtor's executor.

8. In order to ensure this matter reaches the Court's attention, the Debtor (through counsel) is filing this Response and Status Report separate from the Motion to be filed.

WHEREFORE, the Debtor so reports.

Respectfully Submitted,

/s/ David A. Colecchia

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